

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF JEFFREY G.
OJEMANN, MD

DECLARATION OF JEFFREY
G. OJEMANN, MD

ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, Jeffrey G. Ojemann, declare as follows

2 1. I am over the age of 18, competent to testify as to the matters herein, and attest to
3 the information set forth below through personal knowledge as well as through Seattle Children's
4 Hospital, inclusive of Seattle Children's Research Institute, ("Seattle Children's") personnel who
5 have assisted me in gathering this information from our institution.

6 2. I am currently Senior Vice President, Chief Physician Executive at Seattle
7 Children's. I have held this position since September 2024. In my role as Chief Physician
8 Executive, I am accountable for Seattle Children's quality, safety and medical staff programs as
9 well as for the development of clinical models, provider support programs and provider growth
10 plans needed to support Seattle Children's mission to provide hope, care and cures to help every
11 child live the healthiest and most fulfilling life possible.

12 3. Prior to my appointment as Seattle Children's Chief Physician Executive, I served
13 as Seattle Children's Chief Medical Officer, and prior to that role I served as its Surgeon-in-
14 Chief. Since 2019, I have been a member of Seattle Children's executive leadership team
15 reporting directly to Seattle Children's Chief Executive Officer. I served for more than 10 years
16 as the head of the division of neurosurgery at Seattle Children's before my Surgeon-in-Chief
17 role.

18 4. I earned my medical degree and completed a residency in neurosurgery and a
19 fellowship in pediatric neurosurgery at Washington University School of Medicine in St. Louis.
20 I am board-certified in Neurological Surgery and in Pediatric Neurological Surgery. I have been
21 a member of Seattle Children's medical staff with clinical privileges since 2003. I am currently
22 an attending physician in Neurosurgery at Seattle Children's and previously served as co-director
23 of its Neuroscience Center.

24 5. In addition to my clinical practice, I am a Professor and Vice-Chair for Research
25 in Neurological Surgery at the University of Washington School of Medicine. I am extensively
26 involved in clinical research, with current interests that include brain wave correlates of motor

1 behavior, brain control of robotics, functional MRI in children, and using brain stimulation for
 2 mapping and encouraging recovery of function. My clinical research has been funded in part by
 3 the National Institutes of Health (NIH) and the National Science Foundation (NSF) through
 4 various grants spanning more than 20 years, through the present.

5 **Research & Education Grants at Seattle Children's**

6 6. At the heart of Seattle Children's mission to provide hope, care and cures for
 7 children lies a commitment to relentless innovation. Seattle Children's through its Research
 8 Division leads this charge, working every day to drive scientific discoveries, foster
 9 groundbreaking therapies, and ultimately, equip clinicians with life-changing treatments for their
 10 patients. At Seattle Children's, research is not confined to the lab--- it's woven into the clinical
 11 care and support that our patients and families experience.

12 7. Seattle Children's robust research program includes more than 375 faculty
 13 investigators and nearly 100 postdoctoral scholars in our Research Division. Researchers at
 14 Seattle Children's explore nearly every aspect of pediatric health and disease, from bench
 15 research to clinical trials, including research in childhood cancer and blood disorders;
 16 immunotherapy; infectious diseases; neurological disorders; child health, behavior and
 17 development; respiratory diseases and translational research. Our researchers work relentlessly
 18 to discover innovative solutions to many of the barriers that our patients face. The knowledge
 19 gained through our research influences the innovative care we give our patients at Seattle
 20 Children's.

21 8. Seattle Children's research is funded in large part by federal funds. In 2024,
 22 Seattle Children's was awarded nearly \$185 million in federal research grants. Seattle Children's
 23 ranks among the top four pediatric academic research institutions in the country to receive
 24 National Institutes of Health (NIH) funding, receiving nearly \$140 million in direct funding and
 25 over \$22 million through subawards in 2024. In addition, in 2024 the U.S. Department of Health
 26 and Human Services provided over \$10 million in direct and subaward funding. Other critical

1 sources of federal funding for research at Seattle Children's include the National Science
2 Foundation and U.S. Department of Labor, among others, which provided a total of \$12 million
3 in research funding through direct grants and subawards in 2024.

4 9. Seattle Children's federally funded research has contributed significantly to
5 improved outcomes for children across the country. For example, our federally funded research
6 has led to the development of therapies that have dramatically increased the life expectancy of
7 patients with cystic fibrosis. It has also led to novel treatments for pediatric cancer patients
8 through immunotherapy. In addition, our federally funded research has contributed significantly
9 to the understanding of pediatric diseases, such as genetic diseases and Type I diabetes, which
10 is leading to targeted treatments for pediatric patients. In short, the federally funded research
11 conducted at Seattle Children's has been life-changing for countless children.

12 10. Federal funding for research at Seattle Children's helps us support and accelerate
13 the bench to bedside continuum and translate research into treatments, best practices, therapies,
14 and medical devices that ultimately improves the outcomes in pediatric health.

15 11. In addition to our research focus, Seattle Children's is a teaching institution
16 affiliated with the University of Washington School of Medicine. Seattle Children's serves as
17 the education and training site for the School's Department of Pediatrics and is the primary
18 teaching site for clinical training of the School's residents, fellows, and medical students in
19 pediatrics and pediatric specialties. Like other children's hospitals that provide graduate medical
20 education, Seattle Children's receives federal funding from the Children's Hospitals Graduate
21 Medical Education ("CHGME") Program. These critical funds offset approximately 10% of the
22 overall cost associated with providing high quality graduate medical training to more than 1,000
23 residents and fellows who rotate through Seattle Children's each year. In our current fiscal year,
24 we are expected to receive over \$10 million in CHGME funding. This funding supports the
25 training of the next generation of pediatric physicians who will ultimately care for children
26 across the country.

Familiarity with the Executive Order and Its Harmful Effects

12. I have read the Executive Order “Protecting Children From Chemical and Surgical Mutilation” that was issued on January 28, 2025 (the “Executive Order”). Seattle Children’s is concerned with the harmful effects of the Executive Order, including but not limited to Section 4, which directs federal departments and agencies that provide research and education grants to medical institutions like Seattle Children’s to immediately take steps to ensure that institutions like us cease providing gender affirming care services.

13. If the federal government were to stop providing all research and education grants to Seattle Children’s, the impacts would be devastating. An immediate federal funding cut would impact approximately 300 grants that are currently underway. This would disrupt critical research in areas such as pediatric oncology and blood disorders, pediatric respiratory diseases, pediatric cardiology, pediatric mental and behavioral health, pediatric neurologic disorders including seizures. It would also impact the approximately 13 grants that Seattle Children’s has received approval for but have not yet been funded, including research in genetics, obesity, pediatric oncology, asthma and respiratory failure.

14. A cessation of all federally funded support for Seattle Children’s research and training activities would pose an existential threat to our institution as research is core to our mission. We would no longer be able to attract top faculty to Seattle Children’s, and our national reputation would be irreparably harmed. In addition, our ability to support the training of the next generation of physicians and researchers would be negatively impacted. Most devastating, however, would be the impacts to the children of Washington, Alaska, Montana and Idaho, our primary service area, who rely on us as one of the nation’s very best places to care for children and as the top-ranked pediatric hospital in Washington and the Pacific Northwest. Indeed, the impact would be experienced by children across the U.S. as many children, adolescents and young adults with various conditions travel from all over the country to take part in research

1 studies of new investigational options only available through Seattle Children's Research
2 Institute.

3 15. I am not aware of Seattle Children's having ever received federal grant funding
4 contingent upon Seattle Children's *not* providing its patients a particular type of medical
5 treatment or medical care. Indeed, I am not aware of this type of funding condition having ever
6 been placed on Seattle Children's.

7 16. The Executive Order has created an emergency situation at Seattle Children's.
8 We are facing immense pressure from the federal government to stop providing gender-affirming
9 care. This pressure is mounting as we hear of other facilities in parts of the country that have
10 decided to pause or discontinue care. We are experiencing panicked calls, emails, and visits from
11 patients and families who are scared to lose their access to gender-affirming health care. These
12 families are anxious about what a loss of this care would mean to their young family member's
13 mental health, physical health, and safety. Seattle Children's is caught in this emergency because
14 of the Executive Order, and without relief from a court we are unsure how this emergency will
15 resolve.

16 I declare under penalty of perjury under the laws of the Washington and the United States
17 of America that the foregoing is true and correct.

18 DATED this 5th day of February 2025, at Seattle, Washington.

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21 JEFFREY G. OJEMANN, MD
22 SVP and Chief Physician Executive
23 Seattle Children's Hospital
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